

Documents

for

FOIA request

No. #EPA-R6-2015-001073

State  
N.W

**MEMORANDUM**

SUBJECT: Transmittal Memo - Compliance Monitoring Report(s)

FROM: Stacey Dwyer, Chief *Stacey Dwyer*  
Surveillance Section (6EN-AS)

TO: Paulette Johnsey, Chief  
NPDES Compliance Monitoring Section (6EN-WC)

A compliance evaluation inspection was conducted on March 23 - 25, 2010, by inspector David Long at the following location:

Facility Name: Great Lakes Chemical Corporation - South Plant

Address: 324 Southfield Cutoff

City: El Dorado, Arkansas 71730

Permit No.: AR0000680

Type Facility: Federal ( ) Municipal ( ) Non-Municipal (X)

Compliance monitoring reports attached: (Check appropriate box)

NPDES

(X) Major	(X) CEI	( ) PAI	( ) PCI
( ) Minor	( ) CSI	( ) DIA	( ) IU
( ) NOD	( ) CSI-Toxics	( ) BIO	( ) STORMWATER

Comments: *John Stacey*

**RECEIVED**

MAY 4 2010

**6EN-W**

1 - Permit/CD  
2 - AO & AO mat  
3 - DMF's  
4 - Vio. Sum. Log  
5 - NCR  
6 - Correspondence  
7 - CRAS  
Date Filed  
Clerk's Initials

**EPA**

**NPDES Compliance Inspection Report**

**Section A: National Data System Coding**

Transaction Code		NPDES		yr/mo/day		Inspection Type		Inspector		Fac Type	
1	N	2	5	3	A	4	R	5	0	6	0
7	0	8	0	9	0	10	6	11	8	12	0
13	1	14	0	15	0	16	3	17	2	18	3
19	C	20	R	21	1						
22 S I C C O D E 2 8 1 9 & 2 8 6 9 66											
Inspection Work Days		Facility Evaluation Rating		BI		QA		Reserved			
67		68		69		70		71	N	72	N
73		74		75		76		77		78	
79		80									

**Section B: Facility Data**

Name and Location of Facility Inspected <b>Great Lakes Chemical Corporation – South Plant 324 Southfield Cutoff El Dorado, Arkansas 71730</b>		Entry Time/Date <b>8:30 a.m. 03/23/2010</b>		Permit Effective Date <b>01/13/2008</b>	
		Exit Time/Date <b>12:45 p.m. 03/25/2010</b>		Permit Expiration Date <b>02/28/2013</b>	
Name(s) of On-Site Representatives <b>Pete Howard Thomas Hammons David Hill</b>		Title(s) <b>EHS&amp;S Manager Environmental Engineer Environmental Specialist</b>		Phone Number <b>(870) 864-1543 (870) 864-1557</b>	
Name, Address of Responsible Official <b>Thomas Hammons Great Lakes Chemical Corporation 2226 Haynesville Highway El Dorado, Arkansas 71730</b>		Title <b>Environmental Engineer</b>		Phone Number <b>(870) 864-1557</b>	
		Contacted: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>			

**Section C: Areas Evaluated During Inspection**

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<b>S</b>	Permit	<b>U</b>	Flow Measurement	<b>N</b>	Storm Water	<b>N</b>	GSO/SSO/Sewer Overflow
<b>U</b>	Records/Reports	<b>U</b>	Self-Monitoring Program	<b>S</b>	Sludge Handling/Disposal	<b>N</b>	Pollution Prevention
<b>S</b>	Facility Site Review	<b>N</b>	Compliance Schedules	<b>N</b>	Pretreatment	<b>N</b>	Multimedia
<b>S</b>	Effluent/Receiving Waters	<b>U</b>	Laboratory	<b>S</b>	Operations & Maintenance		

**Section D: Summary of Findings/Comments (Attach additional sheets if necessary)**

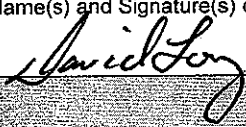
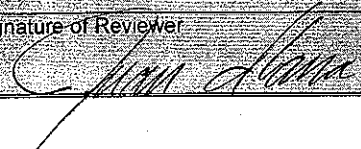
**EXECUTIVE SUMMARY:** The USEPA performed a Compliance Evaluation Inspection (CEI) on the Great Lakes Chemical – South Plant on March 23 – 25, 2010, and was accompanied by EPA Enforcement Officer Anthony Loston and John Lamb, an inspector with the Arkansas Department of Environmental Quality. The inspectors met with Pete Howard, EHS & S Manager, Thomas Hammons, plant Environmental Engineer, and David Hill, facility Environmental Specialist. Mr. Howard was present for the entry and exit briefings, but only Mr. Hammons and Mr. Hill were present during the entire inspection including entry briefing, plant tour, paperwork/laboratory data evaluation, and exit interview. Several issues were noted during the inspection including issues regarding flow measurement, laboratory chain of custody records, sampling procedures and analytical quality control practices.

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Attachments: Photolog, Facility Documentation

Name(s) and Signature(s) of Inspector(s) 		Agency/Office/Telephone <b>US EPA/6EN-AS/(214) 665-7323</b>		Date <b>04/22/2010</b>	
Signature of Reviewer 		Agency/Office <b>US EPA/6EN-AS</b>		Date <b>4/22/10</b>	

## SECTION A – PERMIT VERIFICATION

### PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

Details:

	<u>S</u>	M	U	NA
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	<u>Y</u>	N	NA	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	Y	N	<u>NA</u>	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	<u>Y</u>	N	NA	
4. ALL DISCHARGES ARE PERMITTED	<u>Y</u>	N	NA	

## SECTION B – RECORD KEEPING AND REPORTING EVALUATION

### RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT

Details: Chain of Custody records for collected samples revealed multiple errors including failure to properly identify the analytical methods, lack of daily calibration records for laboratory equipment, incomplete data including sample reweighs on lab bench sheets, and field and lab thermometers that had not been calibrated since October 12, 2006. DMR records indicate a total of 13 violations for 01/01/2009 to 01/01/2010 which included lead, flow, pH, ammonia and fecal coliform violations.

	S	M	<u>U</u>	NA
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs	<u>Y</u>	N	NA	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	S	M	<u>U</u>	NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	<u>Y</u>	N	NA	
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	<u>Y</u>	N	NA	
c) ANALYTICAL METHODS AND TECHNIQUES	Y	<u>N</u>	NA	
d) RESULTS OF ANALYSES AND CALIBRATIONS	Y	<u>N</u>	NA	
e) DATES AND TIMES OF ANALYSES	<u>Y</u>	N	NA	
f) NAME OF PERSON(S) PERFORMING ANALYSES	<u>Y</u>	N	NA	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE – Not provided with analysis	S	M	<u>U</u>	NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR	<u>S</u>	M	U	NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA – Facility is not required to calculate loading data.	Y	N	<u>NA</u>	

PERMIT NUMBER: ARR0000680

## SECTION C – OPERATIONS AND MAINTENANCE

TREATMENT FACILITIES PROPERLY OPERATED AND MAINTAINED  
 Details: Facility maintains a 30,0000 gpd extended air package plant which receives a variable daily flow between 1500 to 12,000 gpd. Disinfection is achieved through the use of three inch chlorine tablets. No dechlorination process is used art this site.

S M U NA

1. TREATMENT UNITS PROPERLY OPERATED

S M U NA

2. TREATMENT UNITS PROPERLY MAINTAINED

S M U NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED

S M U NA

4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE

S M U NA

5. ALL NEEDED TREATMENT UNITS IN SERVICE

S M U NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED

S M U NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED

S M U NA

8. OPERATION AND MAINTENANCE MANUAL AVAILABLE

Y N NA

STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED

Y N NA

PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED

Y N NA

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?

Y N NA

IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?

Y N NA

HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?

Y N NA

10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?

Y N NA

IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?

Y N NA

PERMIT NUMBER: ARR0000680

## SECTION D – SAMPLING

### PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS

Details: Facility is collecting time weighted and not flow weighted samples as required by their permit. Mr. Tom Hammons, Environmental Engineer, indicated that flow from the plant remains stable and consistent, but also indicated that the facility does not have the necessary equipment to collect flow weighted samples.

S M U NA

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT

Y N NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES

Y N NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT

Y N NA

4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT

Y N NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT

Y N NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE

Y N NA

a) SAMPLES REFRIGERATED DURING COMPOSITING – Thermometers lacked current calibration record

Y N NA

b) PROPER PRESERVATION TECHNIQUES USED

Y N NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136

Y N NA

7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?

Y N NA

## SECTION E – FLOW MEASUREMENT

### PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS

Details: Facility has no primary flow measurement device and the Eastech flow meter measures flow prior to final treatment at the sand filters.

S M U NA

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED

Y N NA

TYPE OF DEVICE : None

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED

Y N NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT

Y N NA

4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION May 15, 2007)

Y N NA

RECORDS MAINTAINED OF CALIBRATION PROCEDURES

Y N NA

CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.

Y N NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE

Y N NA

6. HEAD MEASURED AT PROPER LOCATION

Y N NA

7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES

Y N NA

# SECTION F – LABORATORY

## PERMITTEE LABORATORY MEETS PERMIT REQUIREMENTS

Details: Facility has no written procedures for any of their analytical tests performed at their laboratory and reference only the 17<sup>th</sup> Edition of Standard Methods for their written procedures. It should be noted that the 17<sup>th</sup> edition is no longer accepted under the current 40 CFR 136 guidelines. Other laboratory issues include use of EPA pour method for TSS samples, performing only a two point (pH 7.0 and 10.0) pH calibration, and not performing the requisite re-weighs on TSS and TDS samples. Finally, lab references 17<sup>th</sup> edition Standard Methods for sulfates, chlorides, total organic carbon, and Oil and Grease, but are using EPA or alternate procedures provided by the manufacturers of their laboratory equipment.

S M U NA

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)

Y N NA

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED

Y N NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT – Not provided

S M U NA

4. QUALITY CONTROL PROCEDURES ADEQUATE

S M U NA

5. DUPLICATE SAMPLES ARE ANALYZED &gt;10 % OF THE TIME

Y N NA

6. SPIKED SAMPLES ARE ANALYZED &gt;10 % OF THE TIME

Y N NA

7. COMMERCIAL LABORATORY USED

Y N NA

LAB NAME

BioAnalytical

Analab

LAB ADDRESS

Doyline, Louisiana

Kilgore, Texas

PARAMETERS PERFORMED

Biomonitoring

Metals, BOD5, Ammonia

# SECTION G – EFFLUENT/RECEIVING WATER OBSERVATIONS

## BASED ON VISUAL OBSERVATIONS ONLY

Details: No flow noted at time of inspection at 001 or 002

S M U NA

OUTFALL	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
003	None	None	Non Persistent	None	None	Pale Brown	

## COMMENTS:

PERMIT NUMBER: ARR0000680

## SECTION H – SLUDGE DISPOSAL

### SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS

Details: Sludge is removed annually from the aeration chamber and sent to the WCA Union County Landfill, however, RCRA regulations do not require that a sludge DMR be filed.

S M U NA

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY

S M U NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503

S M U NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: \_\_\_\_\_ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

## SECTION I – SAMPLING INSPECTION PROCEDURES

1. SAMPLES OBTAINED THIS INSPECTION.

Y N NA

2. TYPE OF SAMPLE OBTAINED

GRAB \_\_\_\_\_ COMPOSITE SAMPLE \_\_\_\_\_ METHOD \_\_\_\_\_ FREQUENCY \_\_\_\_\_

3. SAMPLES PRESERVED

Y N NA

4. FLOW PROPORTIONED SAMPLES OBTAINED

Y N NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.

Y N NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE

Y N NA

7. SAMPLE SPLIT WITH PERMITTEE

Y N NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED

Y N NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT

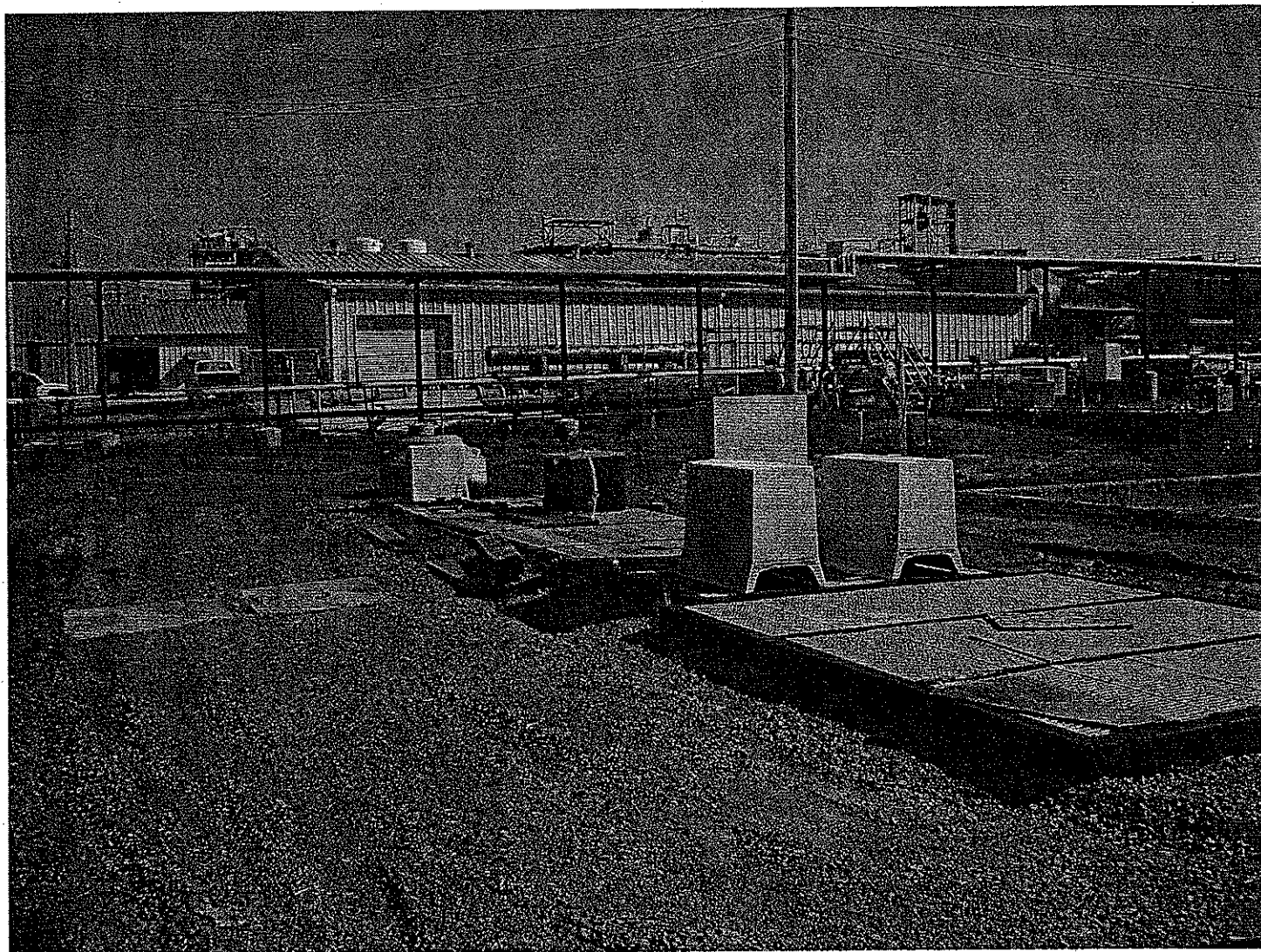
Y N NA



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Official Photograph Log

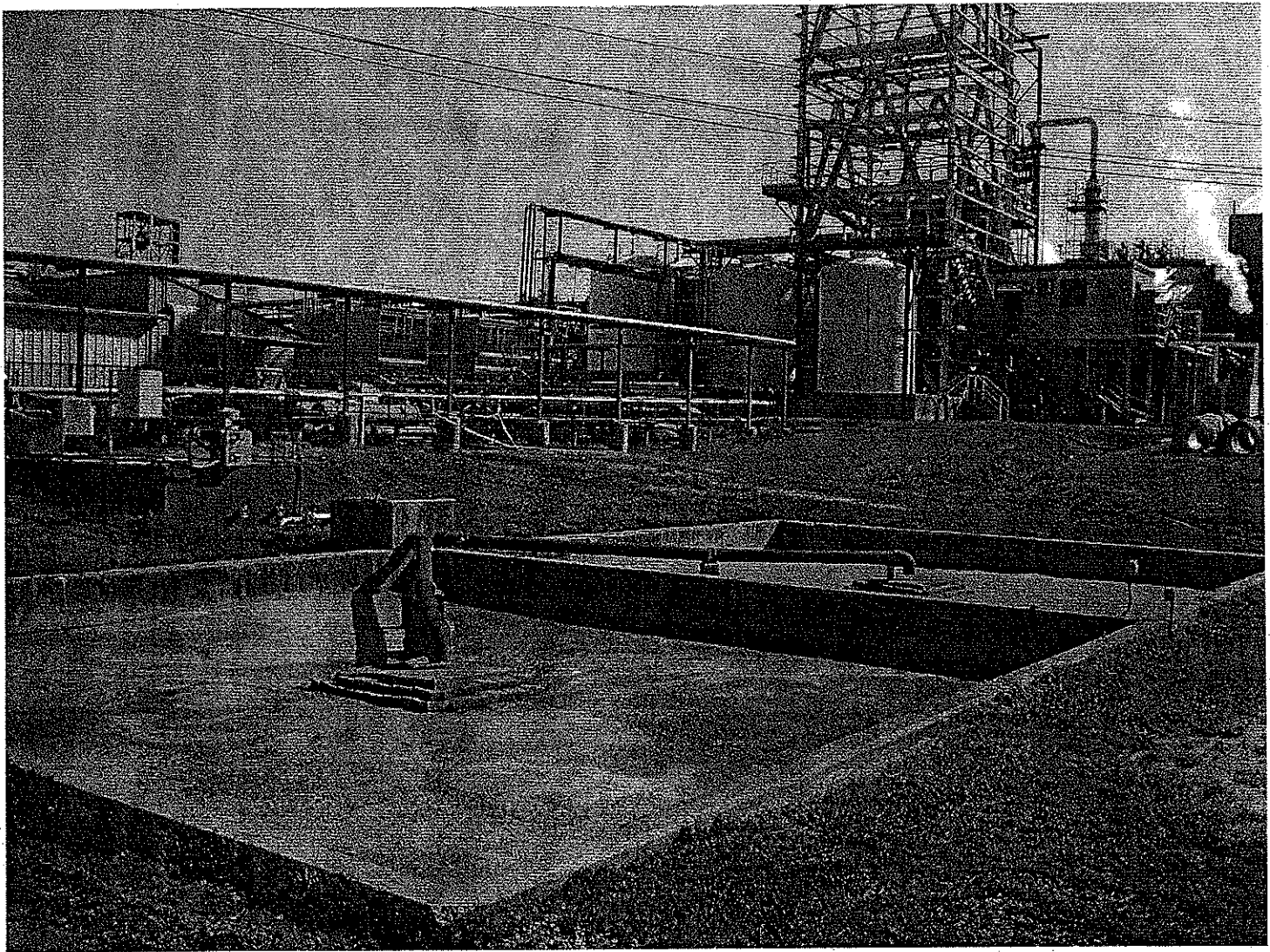
Photographer: David Long	Date: March 24, 2010	Time: 9:13 a.m.
City/County: El Dorado/Union		State: Arkansas
Location: Great Lakes Chemical Corporation – South Plant		
Subject: Wastewater treatment plant		



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Official Photograph Log

Photographer: David Long	Date: March 24, 2010	Time: 9:10 a.m.
City/County: El Dorado/Union		State: Arkansas
Location: Great Lakes Chemical Corporation – South Plant		
Subject: Sand filter system for wastewater treatment plant		

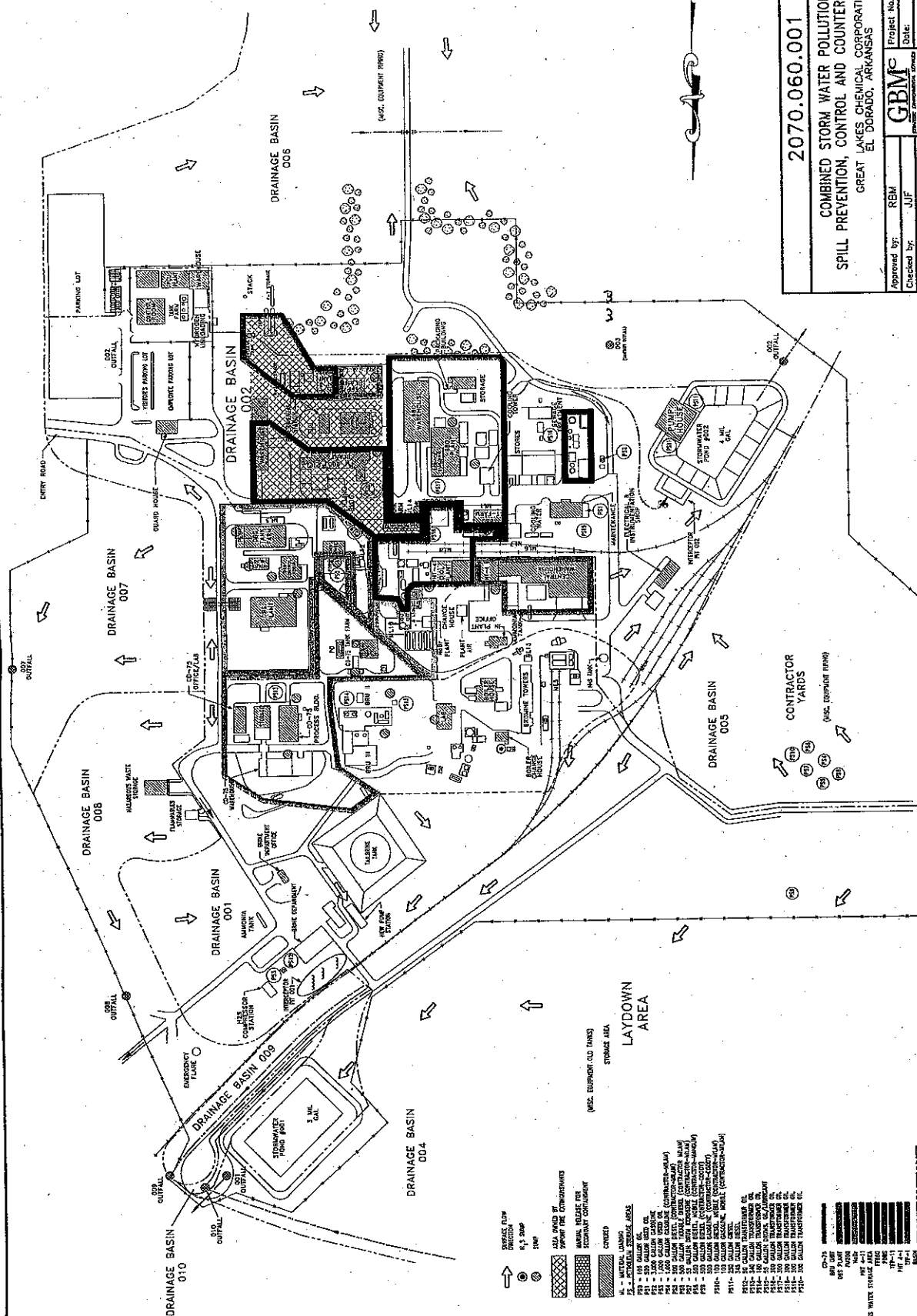


**SANITARY SEWER TREATMENT PLANT 003 OUTFALL RATE (gal.)**

**PREVIOUS MONTH  
END METER**

8251258

[illegible]



2070.060.001

**COMBINED STORM WATER POLLUTION AND  
SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN**

Approved by:	REM	 GEOTECHNICAL BENTONITE MATTING	Project No.:	2070-06-060
Checked by:	JJF		Date:	2/20/2008
Drawn by:	SW		Scale:	1"=250'